

How the Community Eligibility Provision Impacts the Title I Program

1

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Objectives

2

1. Overview of the Community Eligibility Provision (CEP)
2. How does CEP impact other programs such as Title 1 and SAGE/AGR that use free and reduced data?

Proposed Rule

3

Section 104 (a) of the Healthy, Hunger-Free Kids Act of 2010

Alternative to collecting household applications for free and reduced price meals in high poverty schools

Began July 1, 2014 in Wisconsin

Benefits

4

Free Meals for all Students

Breakfast

Lunch

Increased Meal Participation*

9.4%

5.2%

Reduced Administrative Burden

No *meal* applications

Increased Efficiencies

C. Logan et al. (2013). Community Eligibility Provision Final Report. Abt Associates Inc. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Project Officer: John Endahl. Available online at: www.fns.usda.gov/research-and-analysis.

Benefits

5

Simplifies Counting and Claiming

Total Meals

Free and Paid Claiming %

Reduces Direct Certification Runs

Special Provision Match Report

April 1 Reporting

No Paid Lunch Equity Tool

***Still required at Non-CEP sites in mixed districts**

No Verification Process

***Report still required**

Who is Eligible to Elect CEP?

6

**Individual
Schools**

Districts

**≥ 40% Identified
Student Percentage**

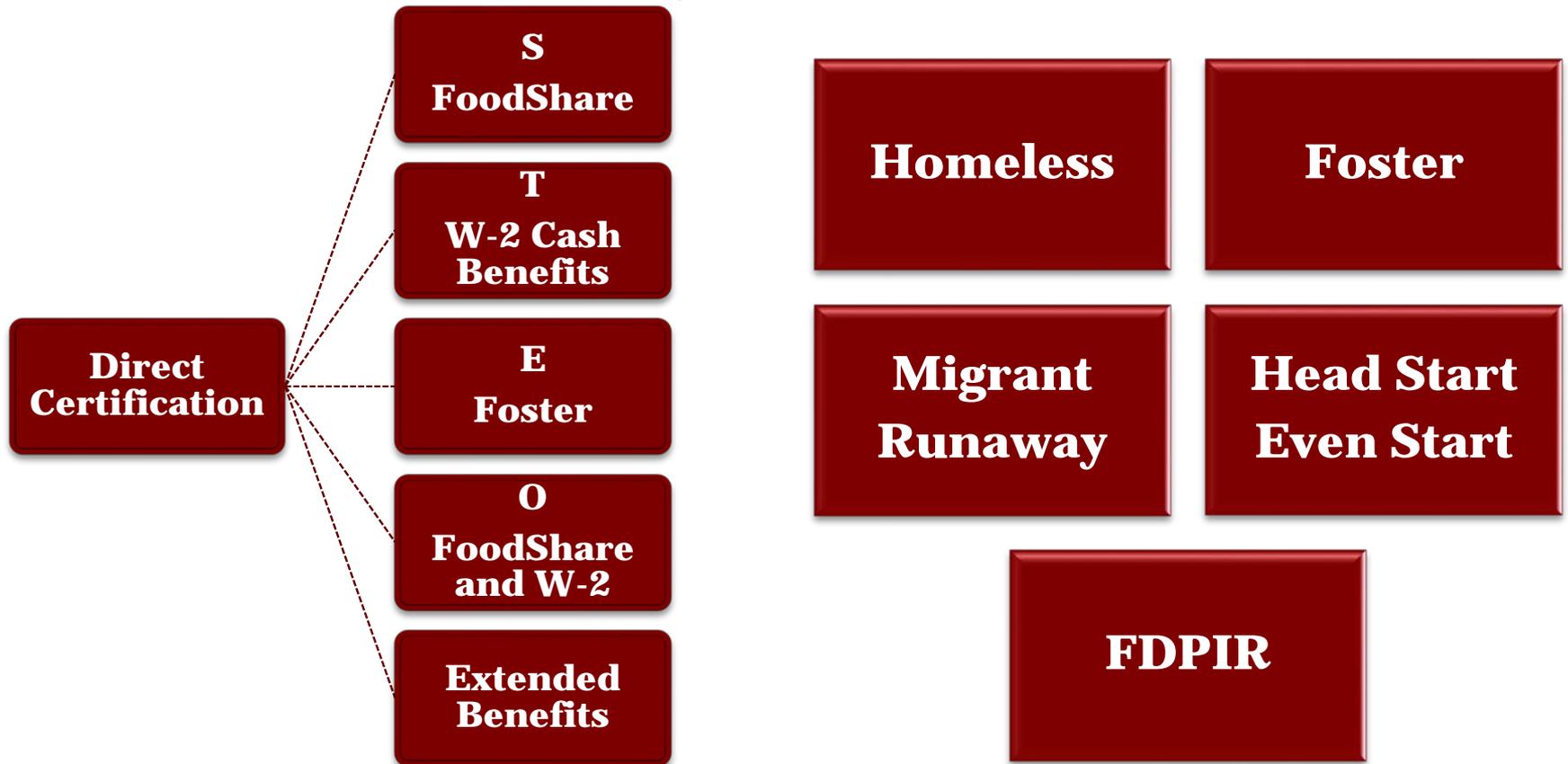
**Groups of
Schools**

****RCCLs are not
eligible***

Identified Students

7

“...number of students approved as eligible for free meals and are not subject to verification.”



Enrolled Students

8

- Students enrolled in and attending schools participating in CEP with access to at least one meal service daily
- Half-day students who have access to either breakfast or lunch are included

April 1 of the year prior to participating

Reimbursement under CEP

9

- The ISP is multiplied by a factor (1.6) to determine the percentage of total meals served that will be reimbursed at the *Federal free rate*
- The remaining percentage of total meals is reimbursed at the *Federal paid rate*
- **NO reduced rate**
- Claiming percentages are guaranteed for 4 years

ISP Example: Lambeau School District

10

School 1	Identified Students • 50	Enrollment • 100	ISP • $50/100 \times 100 =$ 50.000%
School 2	Identified Students • 70	Enrollment • 110	ISP • $70/110 \times 100 =$ 63.636%

CEP Claiming Example: Lambeau SD

11

School #1 ISP
50.000%

+

School #2 ISP
63.636%

=

Combined ISP
57.143%

X

=

CEP Claiming Example: Lambeau SD

12

**Combined
ISP**

57.143%

x

**Federal
Multiplier**

1.6

=

Free Rate

91.43% → 91.4%

100

-

91.4

=

Paid Rate

8.6%

ISP Example: Liberty School District

13

School
1

**Identified
Students**

• 25

Enrollment

• 120

ISP

• $25/120 \times 100 =$
20.833%

School
2

**Identified
Students**

• 125

Enrollment

• 175

ISP

• $125/175 \times 100 =$
71.429%

CEP Claiming Example: Liberty SD

14

School #1 ISP
20.833%

+

School #2 ISP
71.429%

=

Combined ISP
50.848%

X

=

CEP Claiming Example: Liberty SD

15

Combined ISP
50.848%

X

Federal
Multiplier
1.6

=

Free Rate
81.4%

100

-

81.4

=

Paid Rate
18.6%

ISP Example: Tiger School District

16

School
1

**Identified
Students**

• 20

Enrollment

• 150

ISP

• $20/150 \times 100 =$
13.333%

School
2

**Identified
Students**

• 50

Enrollment

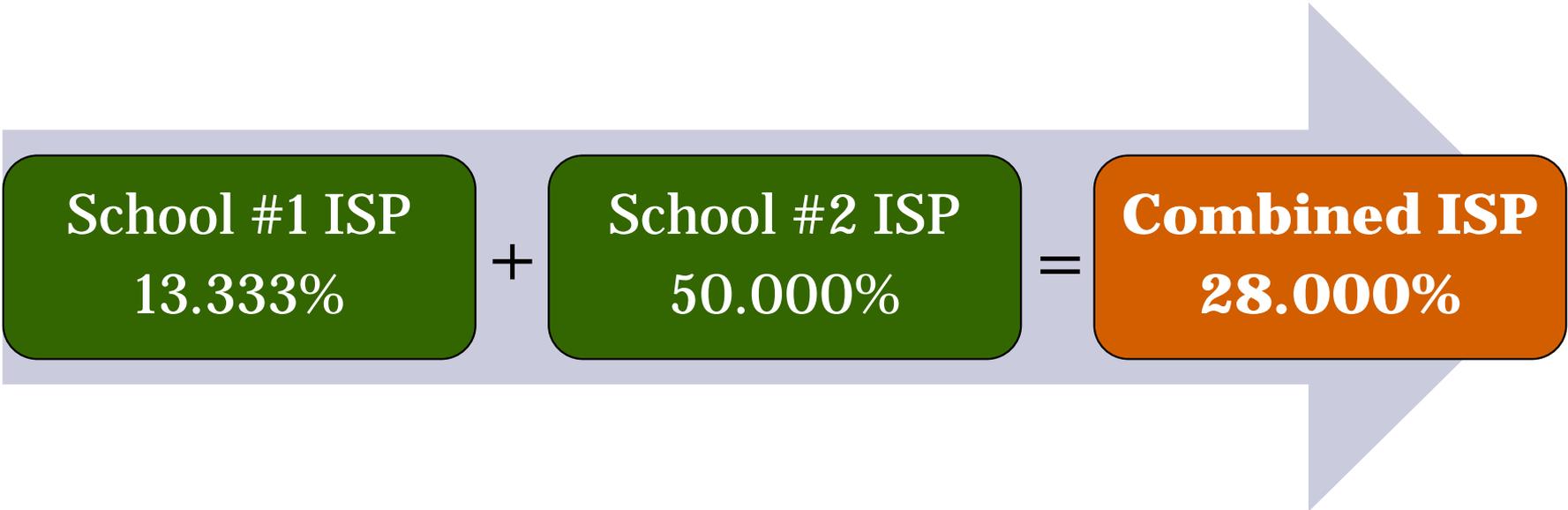
• 100

ISP

• $50/100 \times 100 =$
50.000%

CEP Claiming Example: Tiger SD

17



Things to Consider...

18

LEA must cover costs above Federal Reimbursement

with non-federal funds

A la carte sales may be used

Income Forms

Alternative Application

USDA Modified Application

Food Service Funds cannot be used...

for cost associated with processing CEP applications

USDA Monthly Federal Reimbursement Estimator Tool

Community Eligibility Provision (CEP) Monthly Federal Reimbursement Estimator

Use to *estimate* the level of Federal reimbursement received under the CEP

District Name:

Step 1: Calculating the Identified Student Percentage		Step 2: Federal Reimbursement Rates	
If grouping schools, use the grouping calculator to assist in determining 1.1 and 1.2.		Select the current reimbursement rates used for each program (without the \$0.06). The additional \$0.06 is applied in the next box	
Enter the number of identified students and enrolled students that is reflective of April 1 st in 1.1 and 1.2	Click to define: Identified Students		
1.1) Enter the number of identified students	216	Lunch	Breakfast
1.2) Enter the TOTAL student enrollment	345	Free	\$3.00 <input type="text"/> \$1.93 <input type="text"/>
Percentage of identified students = <i>**This percentage must be at least 40% to be eligible**</i>	62.61%	Paid	\$0.30 <input type="text"/> 0.28 <input type="text"/>
Percentage of meals reimbursed at the Federal FREE rate =	100.0%	Select "\$0.06" if the SFA is certified for the additional \$0.06.	
Percentage of meals reimbursed at the Federal PAID rate =	0.0%	\$0.06 <input type="text"/>	
Step 3: Monthly Meal Data		Estimated CEP Monthly Federal Reimbursements	
Enter in the number of LUNCHES and/or BREAKFASTS served in a month in 3.1 and 3.2			
3.1) Enter the total number of LUNCHES served in a month:	3,588	Reimbursement for LUNCH =	\$11,540.28
3.2) Enter the total number of BREAKFASTS served in a month:	2,001	Reimbursement for BREAKFAST =	\$4,224.77
Total number of MEALS served in a month:	5,589	Total Reimbursement Level =	\$15,765.05
Step 4: Anticipated Participation Change due to serving all FREE meals (for example enter 2 for 2%):	<i>NLSP</i>		
	<i>SBP</i>		
	5.20%		
	9.40%		
Total number of LUNCHES reimbursed at FREE rate =	3,775	Federal Reimbursement per LUNCH =	\$3.06
Total number of LUNCHES reimbursed at the PAID rate =	0	Federal Reimbursement per BREAKFAST =	\$1.93
Total number of BREAKFASTS reimbursed at FREE rate =	2,189	Optional Comparison: Enter current monthly Federal reimbursements and student payment revenue	
Total number of BREAKFASTS reimbursed at the PAID rate =	0	LUNCH =	\$10,418.18
CEP Difference:		BREAKFAST =	\$3,718.18
This section displays the estimated difference between operating CEP and the current Federal reimbursements and student payments (if applicable). If the differences boxes are green then CEP will generate the same or more Federal revenue, if the box is red then current procedures generate higher Federal Revenue		LUNCH Difference =	\$1,122.10
		BREAKFAST difference =	\$506.59
		Total Difference	\$1,628.69

Example DPI Grouping Tool



Wisconsin Department of Public Instruction
COMMUNITY ELIGIBILITY PROVISION (CEP)
ELIGIBILITY WORKSHEET
 PI-6304 (Rev. 05-15)

Implementation of Community Eligibility Provision can be by individual school site, by group(s) or by LEA/school district. This form is to document how schools will be combined when participating in CEP. All participating schools and groupings can be listed on one form. To calculate proper reimbursement percentages, assign a school/group number so that each individual school has its own individual school number, and each group of schools share the same school/group number. Schools participating as one large group or LEA will share one school/group number. When grouping schools, list all schools within one group together.

I. DISTRICT INFORMATION

LEA Name	Agency Code

II. COMMUNITY ELIGIBILITY

Participating Sites		Identified Students		Reimbursement	
School Name <i>List each school site individually, even if grouping with other schools</i>	School/ Group No.	Total No. of Identified Students	Total Enrollment <i>Only include students who have access to at least one meal per day</i>	Identified Student Percentage	Federal FREE Reimbursement Rate
School A	1	50	125		
School B	1	66	100		
School C	1	100	120	62.610%	100.0%
School D	2	125	130		
School E	2	50	150	62.500%	100.0%

CEP Resources

22

➤ **School Nutrition Team Website** www.dpi.wi.gov/school-nutrition

- Application Form
- USDA Monthly Reimbursement Estimator
- Frequently Asked Questions
- USDA memos on CEP

➤ **FRAC (Food Research and Action Center)**

<http://frac.org/community-eligibility/>

CEP Contacts

23

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24

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- (1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

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Community Eligibility Provision and Title I Funding

25



Income Verification For Title I

26

Even in CEP schools, socio-economic data is needed for programs like Title I Accountability and AGR/SAGE. CEP schools may use:

- An alternate household income form

OR

- The modified school lunch form



Impact of CEP on Title I Funding

27

- It is not the Title I Coordinator's responsibility to determine if the district will implement CEP for the school lunch and breakfast programs.
- However, the Title I Coordinator should be aware if any of the schools in the district are implementing the CEP as it will impact the data entered on the enrollment screen in the Title I Application.



Impact of CEP on Title I Funding

28

- CEP does NOT impact district level allocations.
- CEP may impact school level allocations.



Common Poverty Metric Options

29

- LEAs must use a **common poverty metric** to determine the number of low income students for school level allocation amounts.
- These common poverty metric options may only be used for ranking schools to determine school level allocations.
- The same metric must be used for comparability reporting.



1) Use actual FRL counts for Non-CEP schools and Directly Certified (DC) data \times the CEP Multiplier for CEP schools

30



Actual FRL
counts



of
Directly
Certified
students



CEP
Multiplier
(1.6)



2) DC data \times the CEP Multiplier for all schools in the LEA

31



of
**Directly
Certified
students**



CEP
Multiplier
(1.6)



3) Use only DC data for all schools in the LEA

32



of
**Directly
Certified
students**

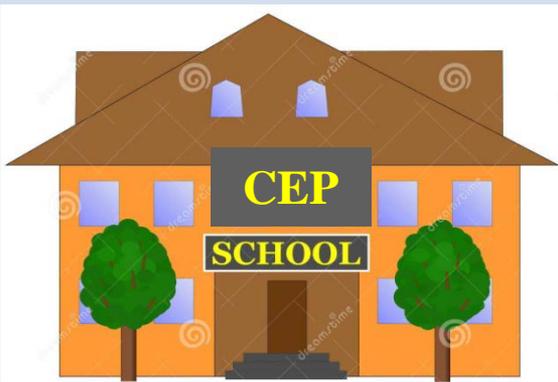


4) Use the FRL counts for Non-CEP schools and DC data plus alternative income verification form data for CEP schools

33



Actual FRL counts



of Directly Certified students

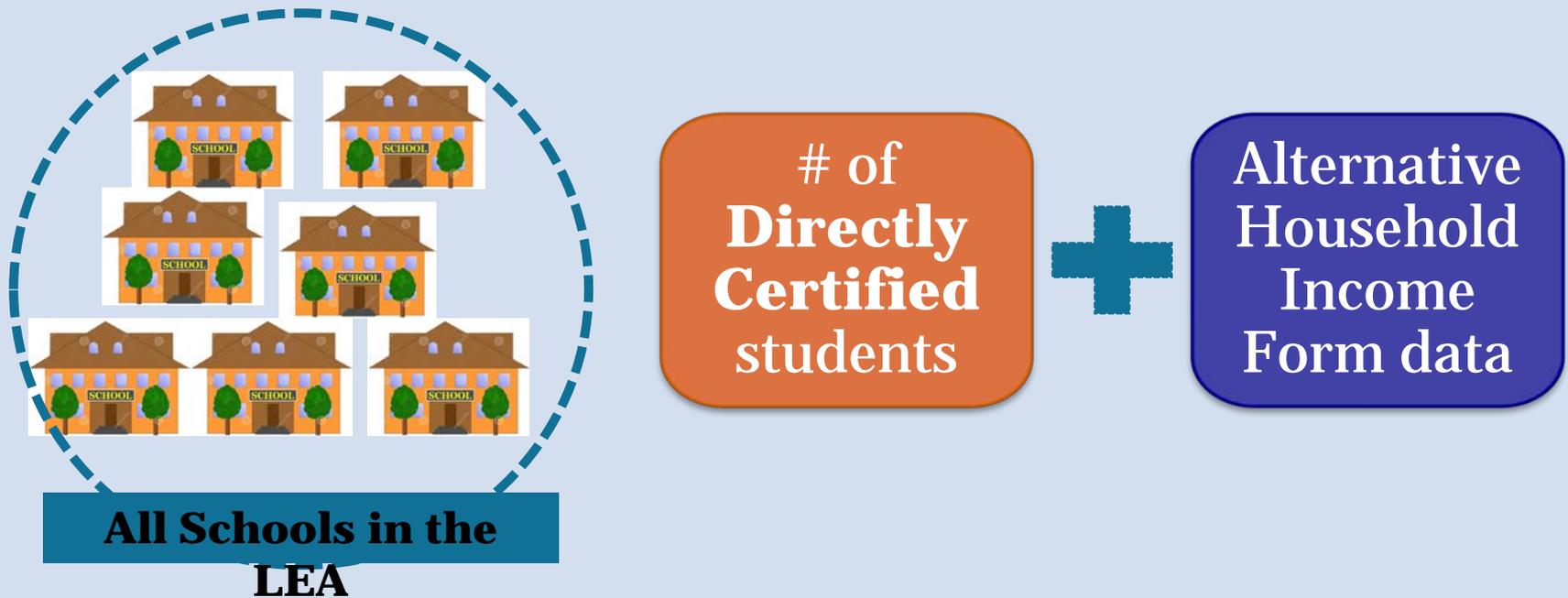


Alternative Household Income Form data



5) Use the alternative income verification form for all schools in the LEA

34



This option is only available to LEAs implementing CEP in every school.



Title I Application

35



Once the number of low income students has been determined for each school, the number should be entered into the “Low Income Pupils: Public” column.

National School Lunch Act W2 Medicaid Census Composite

School	Grade Span	Public Enrollment	Low Income Pupils: Public
(0110) Arboretum EI	PK-04	532	22
(0150) Waunakee Community 4K Sch	K4-K4	0	0
(0080) Waunakee Heritage EI	PK-04	313	241
(0040) Waunakee Hi	09-12	1,163	95
(0020) Waunakee Intermediate	05-06	598	418
(0060) Waunakee Mid	07-08	635	477
(0100) Waunakee Prairie EI	PK-04	541	400
Total Schools: 7		3,782	1,653



Title I Application

36

Utilizing the CEP multiplier may result in a low income pupil number that exceeds the school's enrollment. In this case, LEAs must cap the low income pupil number at enrollment.



Considerations when Selecting a Common Poverty Metric

37

- Select an option to meet student needs.
- Any school over 75% poverty (regardless of grade span) must be served.



CEP and Private School Equitable Participation

38

- Private schools are eligible to participate in CEP if they otherwise meet the USDA's eligibility requirements.
- LEAs will need to learn if any of the private schools participating in their Title I programming also participates in CEP.



Outside Program Contacts

39

Title 1

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